



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

RECEIVED APR 1 1992

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Cecil D. Andrus, Governor Richard P. Donovan, Director

March 27, 1992

Mr. Jerry Lyle
Deputy Assistant Manager
Environmental Restoration & Waste Management
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, ID 83401

RE: Comments for Draft Scope of Work for CFA Landfill I Track 2
Investigation, Operable Unit 4-10.

Dear Mr. Lyle;

IDHW has reviewed the above document and is submitting the enclosed comments. This scope of work (SOW) was received by IDHW on March 4, 1992. The schedule for the investigation was received in a informal copy of the SOW distributed at the Track 2 meeting held March 12, 1992.

Due to the lack of available data, it may be necessary to further characterize CFA Landfill I during the remedial investigation for CFA Landfills II and III (OU 4-12). In this manner, the CFA Landfill I Track 2 investigation could be designed to collect preliminary data which can be utilized to focus the RI for OU 4-12. IDHW requests that the WAG managers from IDHW, EPA, and DOE set up a meeting to discuss the merits of this approach.

If you have any questions regarding the comments please contact David Frederick at (208)-525-7300.

Sincerely,

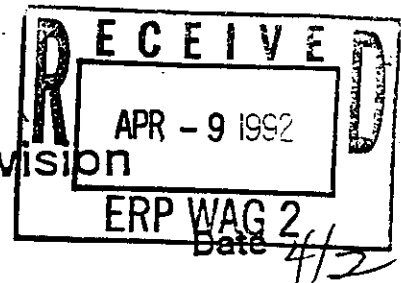
Dean Nygard
Acting Federal Facilities Manager
Community Programs

DN:kmc

cc: A.W. Mikkola, DOE-ID
Howard Blood, EPA Region 10
Shawn Rosenberger, DEQ-IF
David Frederick, DEQ-IF

Approved by [Signature] 4/9/92
done w/ [Signature] 4/9/92
AWOL Sample

Environmental Restoration Division
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Remarks

FROM:

Lars Van Deusen 6-0417

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Phone No.

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TECHNICAL REVIEW COMMENTS
DRAFT SCOPE OF WORK FOR
THE TRACK 2 INVESTIGATION OF
OPERABLE UNIT 4-10:
CFA LANDFILL I
JANUARY 1992

General Comments

- 1) Additional information regarding disposal practices at the landfill is readily available and needs to be considered prior to developing the sampling and analysis plan. For example, information presented at the Track 2 guidance meeting (March 12, 1992) suggests that the "incinerator" located at the site was a wigwam-style unit that would not be able to withstand the high temperatures associated with burning organic solvents. Furthermore, discussions with site employees indicate that the second shift was commonly responsible for gathering up solvents, etc. and disposing of the material at the landfill. Presumably the dump was unattended at this time.
- 2) The results of the geophysical survey conducted at the CFA landfills in 1989 should be reviewed prior to initiating the investigation.

Specific Comments

1) Site History and Background

a) Discussions conducted during the March 12, 1992 meeting suggest that concluding all material was incinerated is inappropriate.

b) Using disposal records from CFA Landfill II to characterize the source term in Landfill I is at best a first-order approximation. This section should be revised accordingly and the investigation needs to be designed in a manner that reflects this uncertainty.

2) Scope for OU 4-10

As noted in the cover letter, the WAG managers need to discuss details for the proposed drilling program. The field work will be guided by the need for source characterization, structure of the basalt-surface alluvium interface (i.e. likely areas for leachate accumulation), and need for hydrogeologic characterization.

3) Conceptual Model

a) "Removal" is not a valid release mechanism and should be deleted from the CSM.

b) The list of receptors needs to be expanded to include the future residential scenario. In addition, volatilization can result in contamination of the unsaturated zone, resulting in the potential for ground-water contamination.

4) Data Quality Objectives Summary

a) The study must also address potential releases from the landfill.

b) The proposed analyte list (CLP-TAL) consists of 23 metals and cyanide. It does not include organic compounds. Therefore, the Target Compound List (TCL) is the appropriate analyte list for the CFA landfill.

c) Where applicable, The CRQL's should be determined by risk-based concentrations. For some compounds this may require use of special analytical services.

d) It is unclear why the reporting limit for volatile compounds in soil vapor is 10 times the detection limit. Why isn't the detection limit used?

e) It is unlikely that analytical level I data will be appropriate for risk assessment.

5) Deliverables and Schedule

To aid IDHW in assessing schedules, the deliverable dates listed in the schedule should reflect the date on which the document was officially delivered/mailed. The copy of the SOW received by IDHW on March 4, 1992 did not include a completed schedule. The above concern was noted in the SOW distributed at the Track 2 meeting held March 12, 1992.